

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

ALAN GOLDMAN,

Plaintiff

v.

MCCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, his wife
MRS. ARIAS, and the Conjugal Partnership
composed by them;
JOSE IRIZARRY-CASTRO;
JOHN DOE; MARY DOE
UNKNOWN INSURANCE COMPANY;

Defendants

CIVIL NO.: 24cv01136(SCC)

**MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION TO
MOTION TO REQUEST AN ORDER OF DISMISSAL WITH PREJUDICE**

TO THE HONORABLE COURT:

NOW APPEAR co-defendants Antonio Arias Larcada, his wife Maria Beale, and the Conjugal Partnership constituted between them, and McConnell Valdés, LLC., through their undersigned counsel, and very respectfully state and pray as follows:

1. On January 15, 2025, plaintiff Alan Goldman filed a **Motion to Request an Order of Dismissal with Prejudice of Defendants' Counterclaim's Second and Third Causes of Action, Alleging "Defamation" and "Abuse of Process" [Document 14] (Dkt. No. 74).**
2. The current deadline to file our opposition is January 29, 2025. The defendants request an additional period of time, up to and including February 18, 2025, to submit their Opposition the plaintiff's **Motion to Request an Order of**

Dismissal with Prejudice of Defendants' Counterclaim's Second and Third Causes of Action, Alleging "Defamation" and "Abuse of Process".

3. The requested extension is necessary due to the fact that the undersigned has various professional commitments during the month of January, including two hearings and various depositions.

WHEREFORE, it is respectfully requested that the Honorable Court extend the time for defendants to file their Opposition to plaintiff's **Motion to Request an Order of Dismissal with Prejudice of Defendants' Counterclaim's Second and Third Causes of Action, Alleging "Defamation" and "Abuse of Process" [Document 14] (Dkt. No. 74)** up to and including February 18, 2025.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 23rd day of January, 2025.

I HEREBY CERTIFY that on this 23rd day of January, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

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